

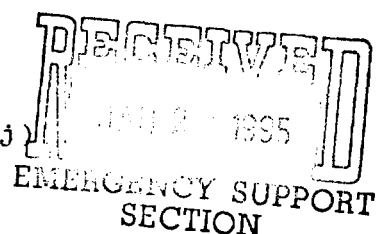
159306

PAUL SAUGET

2901 Upper Cahokia Road
Sauget, Illinois 62201

January 18, 1995

Ms. Carol Graszer Ropski
Emergency Support Section
U.S. Environmental Protection Agency (HSE-5j)
77 West Jackson Boulevard
Chicago, Illinois 60604



Re: General Notice of Potential Liability and
Request for Information
Sauget Area 2, Site Q (formerly known as the
Sauget & Company Landfill), Sauget, Illinois

Dear Ms. Ropski:

I am submitting the two enclosed Responses, and relevant documents, to the above referenced General Notice of Potential Liability and Request for Information, dated December 16, 1994, regarding the property denoted as Sauget Area 2, Site Q, both on behalf of myself individually and on behalf of Sauget & Company. The United States Environmental Protection Agency, Region 5 ("U.S.EPA") granted the Sauget & Company and myself an extension of time to respond to the Information Requests until January 20, 1994 (see January 5, 1995 letter to Deirdre Flannery Tanaka from M. Cyze of the law firm of Gardner, Carton & Douglas).

Also enclosed is an Affidavit submitted as required by the Information Request directed to Sauget & Company. To the extent any information provided in the two Responses should become known to me to be incomplete or inaccurate, I reserve the right to supplement and revise the Responses accordingly.

If you should have any questions, please contact me.

Very truly yours,

A handwritten signature in cursive script that reads "Paul Sauget".

PAUL SAUGET

PS/blw

AFFIDAVIT OF PAUL SAUGET

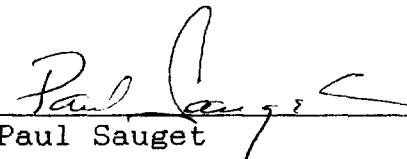
BEING DULY SWORN AND UPON OATH:

1. I, Paul Sauget, was formerly an officer and shareholder of Sauget & Company which dissolved as a corporation on or about March 1, 1984.

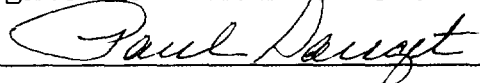
2. In responding to the Information Request, dated December 16, 1994, directed to Sauget & Company, I made a diligent record search and interviewed all individuals who may have information responsive to the Request.

3. To the best of my knowledge, belief and recollection at this time, the Responses are accurate and complete. To the extent the information submitted as a result of my search on behalf of Sauget & Company should later become known by me to be incomplete or inaccurate, I will supplement or revise the Responses as appropriate

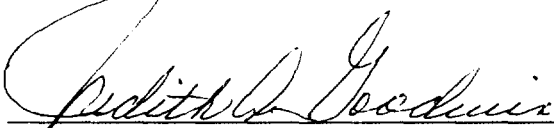
FURTHER, AFFIANT SAYETH NOT.


Paul Sauget

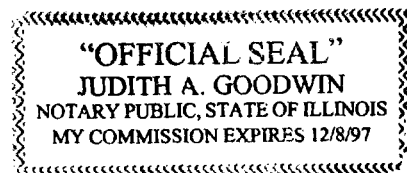
Signed and sworn to before me by



on this 18th day of January, 1995.



Notary Public



INFORMATION REQUESTS (to Paul Sauget)

1. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such person.

ANSWER NO. 1: I do not know of any other individuals who would be able to provide more detailed and complete responses or documents to any Information Request other than those individuals identified as having worked for Sauget & Co. as referred to in the Sauget & Co. Response to the Information Request (hereinafter referred to as "the S & C Response").

2. Did you ever use, purchase, store, treat, dispose, transport, or otherwise handle any hazardous substances or materials at or to the Site?

ANSWER NO. 2: I do not have knowledge as to whether the waste used, purchased, stored, treated, disposed, transported or otherwise handled at or to the Site constituted hazardous substances or materials. I was an employee of Sauget & Co. and was only responsible for managing the other workers. I did not use, purchase, store, treat, dispose, transport, or otherwise personally handle any hazardous waste or materials at the Site. To the best of my knowledge and recollection, generally, the type of waste accepted was paper, wood, general rubbish, food wastes, construction waste (e.g. concrete, brick and wood). At times, drums or containers of waste were accepted, but as there was no manifesting requirements applicable at the time to designate wastes as either non-hazardous or hazardous and no tests were performed on the waste which was accepted, I do not know whether any of the particular wastes accepted at the Site would be deemed "hazardous substances or materials" under the CERCLA definition referenced in the instructions to these requests.

3. Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site. In addition, identify the following:

- (a) The persons with whom you or such other person made such arrangements;**
- (b) Every date on which such arrangements took place;**
- (c) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical**

state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;

- (d) The owner of the waste materials or hazardous substances so accepted or transported;
- (e) The quantity of the waste materials or hazardous substances involved (weigh or volume) in each transaction and the total quantity for all transactions;
- (f) All tests, analyses, and analytical results concerning the waste materials;
- (g) The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;
- (h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
- (i) Where the person identified in g., above, intended to have such hazardous substances or waste materials transported and all evidence of this intent;
- (j) Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
- (k) What was actually done to the waste materials or hazardous substances once they were brought to the Site;
- (l) The final disposition of each of the waste materials or hazardous substances involved in such transactions;
- (m) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the waste material and hazardous substances involved in each transaction;
- (n) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;
- (o) The price paid for (i) transport or (ii) disposal or (iii) both of each waste material and hazardous substance;
- (p) All documents containing information responsive to (a) - (o) above, or in lieu of identification of all relevant documents, provide copies of all such documents; and
- (q) All persons with knowledge, information, or documents responsive to (a) - (o) above.

ANSWER NO. 3: I do not have any personal knowledge responsive to this Request other than that information set forth in the S & C Response Answer No. 3.

4. Have you or any other person working with you or on your behalf ever accepted hazardous substances or waste materials for transportation to the Site from any person? If the answer to this questions is anything but an unequivocal no, identify:

- (a) The persons from whom you or such other persons accepted waste materials for transport to the Site;**
- (b) Every date on which waste materials or hazardous substances were accepted or transported;**
- (c) For each transaction, the nature of the hazardous substances or waste materials accepted or transported, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the material was used or the process which generated the material;**
- (d) For each hazardous substance or material, describe any warnings given to you with respect to its handling;**
- (e) The owner of the hazardous substances or materials so accepted or transported;**
- (f) The quantity of the hazardous substance or material involved (weigh or volume) in each transaction and the total quantity for all transactions;**
- (g) All tests or analyses and analytical results concerning each hazardous substance or material;/ and**
- (h) The price charged for transport and/or disposal per drum, barrel, container, or load (or whatever unit used) of hazardous substance or waste materials brought to the Site.**

ANSWER NO. 4: No.

5. Identify all liability insurance policies held by Respondent from 1955 to the present which relate to the Site. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden, or both types of accidents. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

ANSWER NO. 5: None.

6. Provide copies of all income tax returns as filed sent to the Federal Internal Revenue Service in the last three years.

ANSWER NO. 6: See enclosed documents Bates No. SQ000344 to SQ000409.

7. If Respondent is a Corporation, respond to the following requests:

- (a) Provide a copy of the Articles of Incorporation and By-Laws of the Respondent.**
- (b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to, those filed with the Internal Revenue Service.**
- (c) Identify all of Respondent's current assets and liabilities and the persons who currently own or are responsible for such assets and liabilities.**

ANSWER NO. 7: Not applicable; Respondent is an individual.

8. If Respondent is a Partnership, provide copies of the Partnership Agreement.

ANSWER NO. 8: Not applicable; Respondent is an individual.

9. If Respondent is a Trust, provide all relevant agreements and documents to support this claim and:

- (a) The names and addresses of all current trustees;**
- (b) The names and addresses of all current beneficiaries.**

ANSWER NO. 9: Not applicable; Respondent is an individual.

10. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom.

ANSWER NO. 10: I do not have any personal knowledge responsive to this Request, however, I have heard that after the Site ceased accepting materials in 1973, unauthorized individuals trespassed on the Site and disposed of materials thereon.

11. If Respondent ever has conducted business under any other name:

- (a) List each such name; and**
- (b) Provide the dates during which Respondent used such name.**
- (c) If Respondent is a corporation, provide:**
- (d) The date of incorporation; and**
- (e) The state of incorporation.**

ANSWER NO. 11: I do not believe I have conducted business under any other name. I have been an employee of Sauget & Company and MTS Inc.

12. If Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each corporate relationship, including but not limited to:

- (a) A general statement of the nature of the relationship;**
- (b) The date such relationship existed;**
- (c) The percentage of ownership of Respondent that is held by such other entity; and**
- (d) For each such affiliated entity provide the names and complete addresses of its parent, subsidiary and otherwise affiliated entities.**

ANSWER NO. 12: Not applicable.

13. Identify all of Respondent's predecessors-in-interest and provide a description of the relationship between Respondent and each of those predecessors-in-interest.

ANSWER NO. 13: Not applicable; Respondent is an individual.

14. If Respondent no longer exists as a legal entity because of dissolution provide:

- (a) A brief description of the nature and reason for dissolution;**
- (b) The date of dissolution;**
- (c) Documents memorializing or indicating the dissolution of the entity;**
- (d) A statement of how and to whom the entity's assets were distributed.**

ANSWER NO. 14: Not applicable; Respondent is an individual.

15. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:

- (a) The title and dates of the documents that embody the terms of such transaction (i.e., purchase agreements, merger and dissolution agreements, etc.);**
- (b) The identities of the seller, buyer and any other parties to such transaction; and**
- (c) A brief statement describing the nature of the asset purchases and mergers.**

ANSWER NO. 15: Not applicable; Respondent is an individual.

16. If Respondent has filed for bankruptcy, provide:

- (a) The U.S. Bankruptcy Court in which the petition was filed;**
- (b) The docket number of such petition;**
- (c) The date the bankruptcy petition was filed;**

- (d) Whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or another provision; and
- (e) A brief description of the current status of the petition.

ANSWER NO. 16: Not applicable.

17. Has the Respondent submitted information to other federal, state or local regulatory agencies, including but not limited to the Illinois Pollution Control Agency, Illinois Environmental Protection Agency, U.S. Department of Labor, or U.S. Department of Transportation, either verbally or in writing, concerning its disposal or treatment or arrangement for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site. If yes, describe what was requested, what was provided, when information was given, and to whom it was given. If written documentation was given please provide a copy of that information in your response to this request.

ANSWER NO. 17: See the S & C Response Answer No. 17.

18. According to a letter addressed to Riverport Terminal & Fleeting Company, dated June 30, 1980, during the week of May 26, 1980, a Pillsbury contractor ruptured a barrel containing a chemical substance on the Site. This container was identified as belonging to Monsanto and copies of a Monsanto internal memorandum reflected that C.F. Buckley prepared a report which was distributed to D.T. Mayer and a copy to M. Dimmitt at the Pillsbury Co. Answer the following questions pertaining to this "incident":

- (a) Completely describe the incident, including but not limited to the following: date of the incident; time; precise location (including place and depth); the names of the bulldozer drivers and other contractor employees on site at the time the incident occurred; the number and types of containers exposed or found; the markings on the containers exposed or found; the persons and companies notified of the incident; the date and time of notification; the actions of Respondent's and other person(s) or company's in response to the incident; the date, time, and method of disposal of the containers; the date, time and results of any testing of the containers; the person(s) and companies' responsible for arranging for the disposal; the person(s) and companies responsible for the actual disposal of the container(s); what legal action including any settlements, lease payment abatements or any other agreements resulting from this incident; whether any other

containers were exposed during this or the completion of this project; and, when, if ever, work was resumed on the Site.

- (b) On a copy of the attached map, please identify where the container was found:**
- (c) Please identify the contractor and all contractor and Respondent employees' (including names, addresses, telephone numbers, and titles then and now) directly or indirectly involved in this incidents.**
- (d) Please identify and provide copies of all communications and records of communication with all other parties, its employees, agents and representatives, or insurance company's concerning this incident, including but not limited to Paul Sauget, Sauget and Co., Pillsbury Company, and any and all owners, operators, lessees or the assigns of the property.**
- (e) Please state what substances were contained in the container(s);**
- (f) Describe whether Respondent has found or placed other containers or barrels on the Site. If yes, please answer questions 7(a) through 7(e) for each incident.**

ANSWER NO. 18: I do not have any knowledge concerning this incident nor do I have any information responsive to subparagraphs (a) through (e) concerning this incident. As to subparagraph (f), I generally recall that during the operations at the Site by Sauget & Co., there were barrels and other containers present on the Site at times but I do not recall any "incident" of the type or nature described in this request occurring with respect to such barrels or containers.